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19 *Attorneys for Plaintiff Luanne Austin*

20 **UNITED STATES DISTRICT COURT**
21 **DISTRICT OF NEVADA**

22 Luanne Austin, individually, on behalf
23 of herself and all others similarly
24 situated,

25 Plaintiff,
26 v.

27 Allied Collection Services, Inc.,
Teachers Health Trust dba THT Health,
and Digestive Disease Center dba
Digestive Disease Specialists,

Defendants.

Case No.: 2:21-cv-01593-RFB-NJK

**Stipulation for an extension of time
for Plaintiff to respond to Defendant
Digestive Disease Center's Motion to
Dismiss**

(First request)

1 Luanne Austin (“Plaintiff”) and Digestive Disease Center dba Digestive
2 Disease Specialists (“Defendant and together with Plaintiff as the “parties”),
3 by and through their respective counsel, hereby submit this stipulation for an
4 extension of time for Plaintiff to respond to Defendant’s motion to dismiss,
5 filed on December 13, 2021. This is the first request for an extension of this
6 deadline.

7 The extension is sought because Plaintiff’s counsel requires additional
8 time to prepare an appropriate response to the motion due to anticipated staff
9 shortages during the upcoming holidays.

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1 In good faith and not for the purposes of delay, the parties therefore
2 stipulate that Plaintiff's opposition to the pending motion shall be due on or
3 before **January, 17, 2022**.

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5 Dated: December 17, 2021.

6 **FREEDOM LAW FIRM**

7 /s/ Gerardo Avalos

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13 **HAYES | WAKAYAMA**

14 /s/ Jeremy Holmes

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21 IT IS SO ORDERED:

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24 UNITED STATES DISTRICT JUDGE

25 DATED: December 21, 2021
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